

ANDERSON KILL & OLICK, P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020

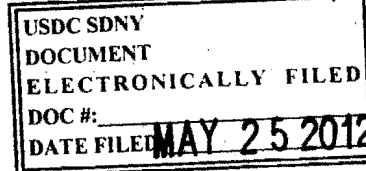
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733

www.andersonkill.com

Vianny M. Pichardo, Esq.

vpichardo@andersonkill.com

212-278-1259



May 24, 2012

BY E-MAIL

(forrestnysdchambers@nysd.uscourts.gov)

Honorable Katherine B. Forrest
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Illinois National Insurance Company v. Tutor Perini Corporation
Index No. 11-cv-00431

Dear Judge Forrest:

We represent Defendant Tutor Perini Corporation ("Tutor Perini") in the above referenced matter and submit this letter with Plaintiffs Chartis¹ and Third-Party Defendant Certain Underwriters at Lloyd's, London ("Lloyd's") (collectively, the "Parties"). Counsel for both Chartis and Lloyd's have reviewed the contents of this letter and they join in the relief requested herein.

Pursuant to section 1(A) of your Honor's Individual Practices, the Parties respectfully request a further extension of the current discovery cut-off from June 1, 2012 in order to proceed with necessary depositions and supplemental document productions, and an adjournment of the currently scheduled status conference for June 29, 2012 to a subsequent date that is convenient for the Court.

On February 3, 2012, Chartis and Tutor Perini submitted a joint request for, *inter alia*, an extension of the discovery deadline, previously set for February 28, 2012. (Docket Entry 43). On February 7, 2012, your Honor granted the joint request, extending the discovery deadline to June 1, 2012, adjourning a previously scheduled status conference until June 8, 2012,² and allowing the filing of (1) an amended answer and counterclaim and (2) a third-party complaint. Id.

¹ Illinois National Insurance Company ("Illinois National"), The Insurance Company of the State of Pennsylvania ("ICSOP"), and National Union Fire Insurance Company of Pittsburgh, PA's ("National Union").

² By Court Order dated April 10, 2012, the status conference has been adjourned to June 29, 2012.

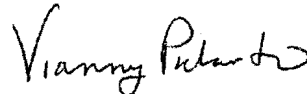
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While the Parties have been advancing discovery in a diligent and expeditious manner, recent case developments have made it necessary to request an additional extension of the current fact discovery deadline. To date, the Parties already have propounded and responded to multiple written discovery requests, have produced numerous sets of responsive documents, and have conducted a number of depositions with more scheduled within the next few weeks. These depositions include non-party subpoenaed depositions as well as foreign depositions that have recently taken place and may also take place in London, England. Additionally, document productions continue to be exchanged by the Parties, and as relevant information is gathered, the need to depose and/or subpoena additional witnesses has come to light. This is especially the case due to the recent filing of the third-party action and the addition of Lloyd's as a Third-Party Defendant (involving policies not previously at issue in this action). However, due to witness unavailability and attorney schedules, the Parties will be unable to schedule all the necessary depositions and produce any supplemental productions prior to the current fact discovery deadline.

Accordingly, the Parties respectfully request that the discovery deadline be extended from June 1, 2012 to October 15, 2012, so as to allow the Parties reasonable time to complete discovery, and an adjournment of the currently scheduled status conference for June 29, 2012 to a subsequent date that is convenient for the Court.

Respectfully submitted,



Vianny M. Pichardo

cc: Chartis' Counsel

John D. Hughes (JHughes@edwardswildman.com)
Joshua W. Gardner (JGardner@edwardswildman.com)
Richard McCarthy (RMcCarthy@edwardswildman.com)

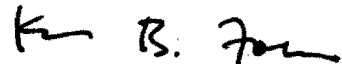
Lloyd's Counsel

George Rockas (George.Rockas@wilsonelser.com)
Jenson Varghese (Jensen.Varghese@wilsonelser.com)

ordered

*Discovery extended
to August 1, 2012 only.
Status conference will
be held on June 29, 2012
May 25, 2012*

SO ORDERED:



HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE